

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

Michael S. Kimm (MK4476)  
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*Attorneys for Defendants*

TAE IN KIM and DAVID D. KIM,  
individually and on behalf of all others  
similarly situated,

Plaintiffs,  
vs.

DONGBU TOUR & TRAVEL, INC., and  
KYU SUNG CHO,

Defendants.

2:12-CV-1136-WHW-MCA

**MOTION TO FILE  
DECLARATION OF  
MICHAEL S. KIMM, ESQ.  
UNDER SEAL**

PLEASE TAKE NOTICE that defendants will move before the Court on short notice, on November 4, 2013, on submission pursuant to Rule 78, for an Order granting defendants' counsel to file the declaration of Michael S. Kimm, Esq., under seal as it implicated attorney client privilege, pursuant to Local Rule 5.3(c).

Defendants will rely on this notice, the supporting Declaration of Michael S. Kimm, and on the record in the case.

Dated: October 14, 2013

/s/ Michael S. Kimm

Michael S. Kimm

Certificate of Service

Michael S. Kimm, Esq., certifies the foregoing notice was served as follows:

Upon all counsel of record:

ECF

Upon Dongbu Tour & Travel, Inc., and Mr. Kyu Sung Cho,

by email and mail addressed to  
23 Broad Avenue, 2d Floor  
Palisades Park, NJ 07650

Dated: October 14, 2013

/s/ Michael S. Kimm  
Michael S. Kimm